

MORVILLO ABRAMOWITZ GRAND IASON & ANELLO P.C.

ELKAN ABRAMOWITZ
RICHARD F. ALBERT
ROBERT J. ANELLO*
BENJAMIN S. FISCHER
CATHERINE M. FOTI
CHRISTOPHER B. HARWOOD
LAWRENCE IASON
BRIAN A. JACOBS
TELEMACHUS P. KASULIS
ROBERT M. RADICK*
JONATHAN S. SACK**
EDWARD M. SPIRO
JEREMY H. TEMKIN
RICHARD D. WEINBERG

565 FIFTH AVENUE
NEW YORK, NEW YORK 10017
(212) 856-9600
FAX: (212) 856-9494

www.maglaw.com

WRITER'S CONTACT INFORMATION

charwood@maglaw.com
(212) 880-9547

SENIOR COUNSEL
PAUL R. GRAND
COUNSEL
JASMINE JUTEAU
CURTIS B. LEITNER
JACOB W. MERMELSTEIN
BRENT M. TUNIS
ROBERT G. MORVILLO
1938-2011
MICHAEL C. SILBERBERG
1940-2002
JOHN J. TIGUE, JR.
1939-2009

*ALSO ADMITTED IN WASHINGTON, D.C.
**ALSO ADMITTED IN CONNECTICUT

December 9, 2020

BY ECF

Honorable Mary Kay Vyskocil

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 1/15/2021

Re: Clarkson Recovery Corp. v. Ryzinski & Macniak, 20 Civ. 4336 (MKV)

Dear Judge Vyskocil:

We represent plaintiff/counterclaim-defendant Clarkson Recovery Corp. ("plaintiff") in the referenced matter. In accordance with the Court's Individual Rules, we write respectfully on behalf of both plaintiff and defendants/counterclaim-plaintiffs Bolek Ryzinski and Lukas Macniak to request a 45-day extension of the deadline for the completion of fact discovery in this action (from January 18, 2021 to March 4, 2021), and a corresponding adjustment of the remaining dates in the Civil Case Management Plan and Scheduling Order (Dkt. 20). A proposed revised Civil Case Management Plan and Scheduling Order (extending all remaining deadlines by 45 days) is being submitted with this letter. This is the parties' first request for an extension of the discovery deadlines.

The parties have been working diligently with respect to discovery, including (i) serving and responding to written discovery, (ii) meeting and conferring on their respective responses to the written discovery, (iii) collecting documents from their respective clients, and (iv) meeting and conferring with respect to search terms to apply to electronic documents they have collected. Although some areas of potential dispute have arisen, the parties have been attempting in good faith to work through them, and will promptly raise with the Court any issues they are unable to resolve. The parties anticipate substantially completing their document productions by late December or early January, but anticipate needing additional time to review each other's productions, discuss any issues that may arise or follow up that may be needed based on the productions, and then conduct deposition discovery. Accordingly, the parties respectfully request that the Court grant the 45-day extension of the discovery deadlines requested herein.

Thank you for considering this request.

Respectfully submitted,

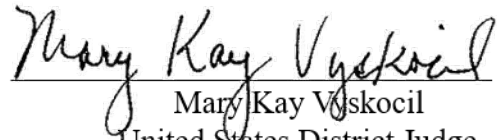
/s/ Christopher B. Harwood

Christopher B. Harwood
Genevieve Hanft

cc: Defendants' counsel (by ECF)

Granted. SO ORDERED.

Date: January 15, 2021
New York, New York



Mary Kay Vyskocil
United States District Judge